



Agricultural Products Group  
1735 Market Street  
Philadelphia, PA 19103  
215-299-6000

201-15985

August 1, 2005

Steve Johnson, Administrator  
US Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116  
Attention: Chemical Right-to-Know Program

RECEIVED  
EPA  
05 AUG -2 AM 8:59

Dear Administrator Johnson:

Subject:

Registration No.:

Common name: DV acid chloride

Chemical name: 3-(2,2-dichloro-ethenyl)-2,2-dimethyl cyclopropanecarbonyl chloride

CAS No.: 52314-67-7

We at FMC Corporation voluntarily have supported EPA's HPV Challenge Program and over the past five years have provided health and safety information to the Agency for our chemicals that met the criteria for testing.

We are writing to respond to EPA comments posted on May 3, 2005 regarding the subject chemical. We had requested a waiver from testing because of the chemical's highly reactive and corrosive nature. EPA agreed that this chemical is highly reactive and advised FMC to conduct testing on the hydrolysis products, when testing on the parent chemical was not feasible.

We wish to inform the Agency that we do not plan to conduct testing of the subject chemical or its hydrolysis products for the following reasons:

1. To the best of our knowledge, DV acid chloride no longer qualifies for the HPVC program. FMC currently imports well below the threshold volume for HPV chemicals, and does not plan to import high volumes in the future.
2. This chemical is highly reactive and corrosive; therefore, the hazards associated with the parent chemical are more relevant than the hazards of the breakdown products. Alkyl acid chlorides can spontaneously react with moisture, alcohols, ammonia, and most amino functionalities. They can also react with metals, making them corrosive to many container types. In addition, alkyl acid chlorides have a tendency to fume by releasing hydrogen chloride (HCl), which can cause pressurization of closed containers.



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3. We value the animal welfare provisions of the HPV program, and believe conducting new tests on a chemical that is no longer an HPV chemical would be inappropriate.

As mentioned above, FMC Corporation actively supports the HPVC program. However, for the reasons described above, we believe it would be inappropriate to conduct testing on the subject chemical or its hydrolysis products. If you have any questions regarding this response, please do not hesitate to contact me.

Sincerely,

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